

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

Retail Access Optimization Initiative

Docket No. N2011-1

**National Association of Postmasters of the United States
First Interrogatories and Requests for Production of Documents to U.S. Postal
Service Witness James Boldt
(NAPUS/USPS-T-1-1-22)
(August 8, 2011)**

Pursuant to Rules 25 through 28 Rules of Practice, the National Association of Postmasters of the United States (NAPUS) directs the following interrogatories to United States Postal Service witness James Boldt (USPS-T-1). If the witness is unable to respond to any interrogatory, NAPUS requests that a response be provided by an appropriate person who is able to provide an answer.

As used in these interrogatories and future interrogatories in this docket, the terms listed below are defined as follows:

The term “document” means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intra-office communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, faxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term “all documents” means every document as above defined known to USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term “Postal Service” includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

Docket Number N2011-1

The term “person” means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term “identify,” when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term “identify,” when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden.

For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/

Robert M. Levi
Director of Government Relations
National Association of Postmasters of the United States

NAPUS/USPS-T-1-1

Please refer to USPS-T-1, page 15. You state that the 2,800 candidate post offices had earned workload of 2 hours or less per day, and annual revenue was less than \$27,500. Please provide the list the 2,800 Post Offices, by state, in excel format, with workload and revenue data for the 12-month period ending in July 2011?

NAPUS/USPS-T-1-2

Consistent with the U.S. Census Department definition of rural areas, please identify those 2,800 candidate Post Offices that are located in rural areas?

NAPUS/USPS-T-1-3

Please provide the data which identifies which of the 2,800 candidate post offices were managed by an on-site Postmaster, rather than a non-Postmaster?

NAPUS/USPS-T-1-4

Please refer to USPS-T-1, page 13. You state that postal management is not pursuing the RAO initiative to achieve a predetermined operating cost savings. Yet, USPS spokeswoman Cathy Yarosky is quoted in the press as stating: "The projected savings, if every one of the 3,653 offices were to close, is \$200 million annually." Please explain in detail how these savings were calculated.

NAPUS/USPS-T-1-5

How many of the 2,800 candidate post offices have been "temporarily suspended"?

NAPUS/USPS-T-1-6

How many of the 2,800 candidate post offices have been part of the delivery unit optimization (DUO) initiative?

NAPUS/USPS-T-1-7

Has the USPS, including any of its Districts, transmitted reduction-in-force (RIF) notices to any of the Postmasters, or managers-in-charge of the 2,800 candidate post offices? If so, how many were distributed?

NAPUS/USPS-T-1-8

How many post office boxes and general deliveries are located within the 2,800 candidate post offices? How many of these boxes are provided without cost, and how many are revenue-producing? What is the total revenue attributable to the boxes located in the 2,800 candidate post offices?

NAPUS/USPS-T-1-9

39 USC 101(b) requires the Postal Service to provide a “maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sufficient? How does this definition differ from “effective and regular service,” as stated in section 231 of *Handbook PO-101*?

NAPUS/USPS-T-1-10

Please refer to USPS-T-1, page 6, Table 1. Could you explain what specifically the “y-axis” represents? Could you please provide a definition for “point of sale” (POS) location?

NAPUS/USPS-T-1-11

How does the Postal Service define “customer visit? Does it only include post office visits in which a financial postal transaction takes place?

NAPUS/USPS-T-1-12

How does the USPS collect customer interaction data for non-financial postal transactions, including customer inquiries and collection of accountable mail)?

NAPUS/USPS-T-1-13

Please refer to USPS-T-1, page 2. The testimony enumerates the operations and transactions provided by U.S. Post Offices and subordinate US Postal Service retail units. Please list the operations, transactions, services and products that Village Post Offices would be required to provide under contract to the USPS.

NAPUS/USPS-T-1-14

Please refer to USPS-T-1, page 2, line 18. How many “non-personnel units” exist? Does the USPS calculate revenue for these units? If so, how and please provide the revenue and expense data per location?

NAPUS/USPS-T-1-15

Please refer to USPS-T-1, page 4, line 15. With reference to the statement regarding the trend for retail revenue and USPS statements that postal customers are surging towards alternative postal retail access, please reconcile with the *FY 2010 Household Diary Study*, filed with the PRC on July 7, 2011, which states “Even with the continued availability of mail-related products and services through alternative modes (such as Internet orders), in-person visits to postal facilities remain stable.”

NAPUS/USPS-T-1-16

Please refer to USPS-T-1, page 6, Table 1. For each of the measured years, please provide the number of POS locations surveyed, and differentiate between urban, suburban and rural/small town locations.

NAPUS/USPS-T-1-17

Please refer USPS-T1, page 15, lines 1 and 2. Do the 2,800 candidate post offices have less than 2 hours per day earned workload and annual revenue of \$27,500 or less? Or does each of the 2,800 candidate post offices fulfill just one of the two measurements?

NAPUS/USPS-T-1-18

Please refer to USPS-T1, page 8, Table 3. How was the sample 748 retail locations selected that is referred to in note 1? How was the sample 481 retail locations selected that is referred to in note 2? In each of the samples, please differentiate the percentage revenue collected among post offices, stations and branches, retail annexes, and contract postal units.

NAPUS/USPS-T-1-19

Please refer to USPS-T1, page 11, line 8. Of the 13,494 retail facilities, how many were independent post offices, and what percentage is located in rural areas or small towns? Please explain why the USPS did not have location data for the remaining facilities?

NAPUS/USPS-T-1-20

Please refer to USPS-T1, page 12, Table 5. Referring to note 1 (lines 8 and 9), please explain the difference between geographic coordinate distance and driving distance?

NAPUS/USPS-T-1-21

Please refer to USPS-T1, page 3, footnote 3. Please provide details on how “earned workload” is calculated? Please explain how “window service activity” is measured.

NAPUS/USPS-T-1-22

Please refer to USPS-T-1, page 15, line 3 and 4, relating to the Small Office Variance (SOV) tool. For the 52-week period ending July 2011, please answer the following questions.

- On what basis was 2 hours of earned workload per day determined as the threshold for identifying post offices for the discontinuance feasibility study?
- Does the 2 hours of earned workload represent the totality of work conducted at the candidate post offices? If not, please explain.

- Please enumerate how many of the 2,800 candidate post offices utilized window automation, through either IRT or POS?
- For those candidate post offices that did not use IRT or POS, how were the number and value of transactions (both financial and non financial) calculated?
- Could you explain how the following post office functions were valued through SOV and the basis of those valuations:
 - Building and ground maintenance, where there was no contractor retained
 - Servicing free post office boxes (i.e., no residential delivery available)
 - Delivery of packages
 - Multiple scans of parcel mail
 - Parcel return service
 - Premium forwarding